

UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI

AFFIDAVIT

I, Gregory Bowie, being duly sworn, depose and state the following:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI) assigned to the office of the Resident Agent in Charge in Springfield, Missouri, and have been so employed since March 2001. As part of my duties as an HSI agent, I investigate criminal violations relating to passport fraud including violations of 18 U.S.C. § 1543, forgery or false use of a passport, wire fraud, in violation of 18 U.S.C. § 1343, and bank fraud, in violation of 18 U.S.C. § 1344. I have received training in criminal investigative procedures from the Federal Law Enforcement Training Center in Glynco, Georgia.

2. This affidavit is submitted for the limited purpose of establishing probable cause that Segun Prosper OTARU, the defendant herein, committed a violation of Title 18, United States Code, Section 1344. Consequently, this affidavit does not include every fact known to me.

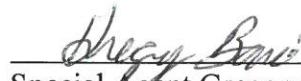
3. Regions Bank, headquartered at 1900 Fifth Avenue North, in Birmingham, Alabama, with a branch office located at 2927 South Campbell Avenue, in Springfield, Missouri, was a financial institution as that term was defined in Title 18, United States Code, Section 20(1), since it was an insured depository institution under the Federal Deposit Insurance Act, Title 12, United States Code, Section 1813(c)(2).

4. On October 9, 2018 Springfield, MO Police responded to Regions Bank, located at 2927 S. Campbell in reference to a person attempting to make fraudulent wire transfers. Officer Nolan arrived and made contact with bank employees who identified a black male in the lobby who was the suspect. Officer Nolan made contact with the suspect who was identified under two names: Segun OTARU and Simon Augustus. Both identifications were found on the subject. The identifications were identified as: Nigerian Driver's license under the name of Simon Augustus, Nigerian Passport #A03063766 containing US B1/B2 Visa #20183680940001 also in the name of Simon Augustus, a Missouri Driver's license under the name Segun OTARU, and a United States Employment Authorization Card in the name Segun OTARU. Regions Bank teller Tina Lawson stated to Officer Nolan that she received a phone call from Regions Bank about a fraudulent wire that was received into the account of Simon Augustus. The victim had wired \$4,680.00 to the Regions account. OTARU was arrested and transported to the Greene County Jail.

5. On October 9, 2018, at approximately 4:15 p.m., Springfield Police Detective Justin Thorn, U.S. Secret Service Special Agent Jason Ruyle, and HSI Special Agent Greg Bowie interviewed OTARU at the Greene County Jail. Detective Thorn read OTARU his Miranda Warnings and he agreed to answer questions without the presence of an attorney. OTARU stated that Segun OTARU was his correct name. OTARU was identified as a citizen and national of Nigeria who is a Permanent Resident Alien. OTARU stated that he received the fraudulent

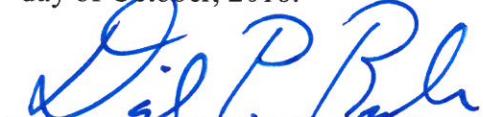
Nigerian Passport and driver's license in the mail from a person known only as "Akem" who resides in Nigeria. OTARU said that "Akem" owed him money and that he did not want to use his own bank account to receive the money because he does not trust "Akem". OTARU admitted to using the fraudulent Nigerian Passport to open the bank account at Regions Bank to receive bank wires. OTARU denied any knowledge of the fraudulent activity mentioned by the bank teller. In OTARU's wallet an Academy Bank debit card under the name Simon Augustus was found. OTARU did also admit to opening a bank account at Academy Bank utilizing the fraudulent Nigerian Passport. OTARU was asked why he opened the Academy Bank using the fraudulent passport and he stated it was also to receive wire transfers from "Akem".

6. On October 10, 2018, records checks were conducted on the documents seized from OTARU in the name of Simon Augustus. These records checks indicated that the documents in the name of Simon Augustus were not valid



Special Agent Gregory Bowie
Homeland Security Investigations

Sworn and subscribed before me this 10th day of October, 2018.



David P. Rush
United States Magistrate Judge